

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

**In Re: Methyl Tertiary Butyl Ether (“MTBE”)
Products Liability Litigation**

**Master File No. 1:00-1898
MDL No. 1358 (SAS)
M21-88**

This Document Relates To:

**NOTICE OF JOINT MOTION TO
DISMISS**

***City of Lowell v. Amerada Hess Corp., et al., Case
No. 05-CV-04018
Town of Duxbury, et al. v. Amerada Hess Corp.,
Case No. 04-CV-1725***

Pursuant to Rule 41(a)(2) of the Federal Rules of Civil Procedure, Plaintiffs and Settling Defendants, Global Companies LLC, Global Montello Group LLC, Chelsea Sandwich LLC, Global Revco Dock LLC, and Global Petroleum Corporation (“the Settling Defendants”) (collectively “the Parties”), move the Court to enter agreed Stipulations and Orders of Dismissal with Prejudice in each of these cases. The Parties have agreed to a settlement agreement and final resolution of all matters in controversy between them, including the settlement of the above cases, and executed Stipulations of Dismissal. The Parties have agreed that each shall bear their own costs, expenses, and attorneys’ fees.

WHEREFORE, the Parties request that this Court enter the attached Stipulations and Orders of Dismissal with Prejudice under Rule 41 of the Federal Rules of Civil Procedure, costs and expenses to be borne by the party incurring them, and for such other relief to which they may be entitled.

DATED: May __, 2009



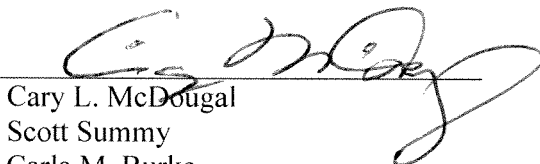
Robin E. Greenwald
Robert J. Gordon
WEITZ & LUXENBERG, P.C.
180 Maiden Lane, 17th Floor
New York, NY 10038-4925
Telephone: (212) 558-5505
Facsimile: (212) 558-5500

Respectfully submitted,



Christopher J. Garvey
GOODWIN PROCTER LLP
The New York Times Building
620 Eighth Avenue
New York, NY 10018-1405
Telephone: (212) 459-7413
Facsimile: (212) 355-3333

*Attorneys for Settling Defendants Global
Companies LLC, Global Montello Group
LLC, Chelsea Sandwich LLC, Global Revco
Dock, LLC, and Global Petroleum
Corporation*



Cary L. McDougal
Scott Summy
Carla M. Burke
BARON & BUDD, P.C.
3102 Oak Lawn Avenue, Suite 1100
Dallas, TX 75219-4281
Telephone: (214) 523-6267
Facsimile: (214) 520-1181

Attorneys for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that on June 24, 2009, a true and correct copy of foregoing NOTICE OF JOINT MOTION TO DISMISS was electronically served on all counsel via LexisNexis File & Serve and via liaison counsel distribution lists.

/s/ Christopher J. Garvey
Christopher J. Garvey